UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

IN RE GENWORTH FINANCIAL, INC., SECURITIES LITIGATION	Civ. A. No. 3:14-cv-00682-JAG Hon. John A. Gibney, Jr. **CLASS ACTION**

LEAD PLAINTIFFS' MOTION
FOR ENTRY OF CLASS DISTRIBUTION ORDER

Pursuant to Rule 23 of the Federal Rules of Civil Procedure and Local Civil Rule 7, Lead Plaintiffs Her Majesty the Queen in Right of Alberta and Fresno County Employees' Retirement Association ("Lead Plaintiffs") move this Court for entry of an Order, *inter alia*, approving distribution of the Net Settlement Fund to Authorized Claimants as set forth in the Declaration of Megan M. Peters in Support of Lead Plaintiffs' Motion for Approval of Distribution Plan ("Peters Declaration"), attached hereto as Exhibit 1.[1]

This Motion is based on the accompanying Memorandum of Points and Authorities in Support Thereof, the Peters Declaration and exhibits thereto, all pleadings and papers filed herein, arguments of counsel, and any other matters properly before the Court.

Lead Counsel have given notice to Defendants' Counsel of this Motion, and have confirmed that Defendants do not oppose the Motion. Lead Counsel are not aware of any opposition to this Motion and there are no Claims in dispute for the Court's review. The parties agree that the motion may be submitted without oral argument.

Lead Plaintiffs submit herewith a [Proposed] Class Distribution Order for the Court's consideration.

[1] All capitalized terms that are not defined herein are defined in the Stipulation and Agreement of Settlement dated as of April 1, 2016 (ECF No. 196-1).

Dated: May 30, 2017

Respectfully submitted,

/s/ Susan R. Podolsky

Susan R. Podolsky (Va. Bar No. 27891)
LAW OFFICES OF SUSAN R. PODOLSKY
1800 Diagonal Road, Suite 600
Alexandria, VA 22314
Tel: (571) 366-1702
Fax: (703) 647-6009
spodolsky@podolskylaw.com

Local Counsel for Lead Plaintiffs Her Majesty the Queen in Right of Alberta and Fresno County Employees' Retirement Association

BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP
David R. Stickney (admitted *pro hac vice*)
Jonathan D. Uslaner (admitted *pro hac vice*)
Richard D. Gluck (admitted *pro hac vice*)
Brandon Marsh (admitted *pro hac vice*)
12481 High Bluff Drive, Suite 300
San Diego, CA 92130
Tel: (858) 793-0070
Fax: (858) 793-0323
davids@blbglaw.com
jonathanu@blbglaw.com
rich.gluck@blbglaw.com
brandon.marsh@blbglaw.com

Counsel for Lead Plaintiff Fresno County Employees' Retirement Association and Co-Lead Counsel for the Settlement Class

BLEICHMAR FONTI & AULD LLP
Joseph A. Fonti (admitted *pro hac vice*)
Javier Bleichmar (admitted *pro hac vice*)
Wilson Meeks III (admitted *pro hac vice*)
7 Times Square, 27th Floor
New York, NY 10036
Tel: (212) 789-1340
Fax: (212) 205-3960
jfonti@bfalaw.com
jbleichmar@bfalaw.com
wmeeks@bfalaw.com

Counsel for Lead Plaintiff Her Majesty the Queen in Right of Alberta and Co-Lead Counsel for the Settlement Class

CERTIFICATE OF SERVICE

I hereby certify that on May 30, 2017, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

/s/ Susan R. Podolsky

Susan R. Podolsky (Va. Bar No. 27891)
LAW OFFICES OF SUSAN R. PODOLSKY
1800 Diagonal Road, Suite 600
Alexandria, VA 22314
Telephone: (571) 366-1702
Facsimile: (703) 647-6009
spodolsky@podolskylaw.com

Local Counsel for Lead Plaintiffs Her Majesty the Queen in Right of Alberta and Fresno County Employees' Retirement Association